

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGANYUSEF LATEEF PHILLIPS,  
Plaintiff,

v.

COUNTY OF KENT; SHERIFF STELMA;  
and DEPUTY ANDREW HINDS,  
Defendants.

Case No. 1:19-cv-331-JTN-ESC

Honorable Janet T. Neff

AFFIDAVIT OF YUSEF LATEEF PHILLIPS

I, Yusef Lateef Phillips, being first duly sworn upon oath,  
state and depose as follows:

1. I am the plaintiff in the above-entitled action and have personal knowledge of the facts set forth herein.
2. On September 3, 2017 at approximately 4 a.m., I was shot in the chest with a tactical rifle by Kent County Deputy Sheriff Andrew Hinds.
3. I was simply walking on the sidewalk at the Burton's Landing apartment complex when I was suddenly shot with no warning whatsoever.
4. Nobody said anything and I was unaware of a police presence until after I was already shot in the chest.
5. I was unarmed and only wearing a pair of sweat pants and a sleeveless t-shirt and shoes.
6. I had nothing in my hands; I made no furtive movements.
7. I was not crouching or trying to hide from police because I didn't even know that police were there.
8. I was not trying to run from police.
9. I was not threatening anybody, and police had no reason to think that I was an immediate danger to anyone.

10. I was bleeding profusely from the gunshot wound, which entered my chest and exited my back near my spine. My lung was punctured. I believed that I was going to die.

11. To this day, I still suffer all of the pain and injuries which were detailed in my initial Complaint.

12. If police had announced their presence and given me verbal commands, I would have fully complied with their directions.

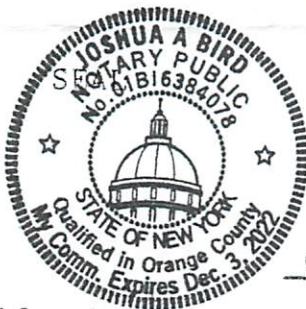
13. Deputy Hinds lacked probable cause to believe that I was a threat to the safety of anyone, and he violated my clearly established right to be free from excessive force by shooting me in the chest with an assault rifle when such action was not justified given the facts of the situation.

FURTHER AFFIANT SAYETH NOT.

Yusef Lateef Phillips  
Yusef Lateef Phillips

STATE OF NEW YORK }  
COUNTY OF ORANGE } ss: OTISVILLE

On this 3 day of December, 2019 Yusef Lateef Phillips personally appeared before me, a Notary Public, and provided to me to my satisfaction that he is the person whose name is subscribed to this document and acknowledged execution of same.



Joshua A. Bird  
Notary Public

Certificate of Service

I certify that I have delivered a copy of the foregoing to the defendant by mailing to his attorney of record, Mr. Eagle.  
Done this 4th day of December, 2019.

Yusef Lateef Phillips  
Yusef Lateef Phillips

Yusef Lateef Phillips  
Reg#09438-040  
Federal Correctional Institution  
P.O. Box 1000  
Otisville, NY 10963

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